

# **EXHIBIT A**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In Re: Methyl Tertiary Butyl Ether ("MTBE") Products  
Liability Litigation

This document relates to:

*Town of Brewster, et al. v. Atlantic Richfield Company, et al.*, No. 13-cv-07247

*Town of Hinesburg v. Atlantic Richfield Company, et al.*, No. 13-cv-07271

*City of Manning v. Ashland Inc., et al.*, No. 13-cv-07272

*City of Portageville v. Ashland, Inc., et al.*, No. 13-cv-07299

Master File No. 1:00 – 1898

MDL 1358 (SAS): M21-88

**[PROPOSED] CASE MANAGEMENT ORDER NO. 111**

The Court hereby sets the following deadlines in the above-captioned action:

<b><u>Event</u></b>	<b><u>Deadline</u></b>
Deadline to Answer	November 15, 2013
Parties to Comply with CMOs 4 and 10 Productions	March 15, 2014
Deadline to Amend Complaint	
Deadline to Join Third Parties	May 15, 2014
Plaintiffs to Designate Non-Site-Specific Experts	September 15, 2014
Defendants to Designate Non-Site Specific Experts	October 1, 2014
Deadline to Serve Interrogatories and Document Requests	October 15, 2014
Plaintiffs to Designate Site-Specific Experts	November 3, 2014
Deadline to Notice Depositions	November 14, 2014
Deadline to Subpoena Documents and/or Deposition	
Plaintiffs to Serve Non-Site-Specific Expert Reports	November 17, 2014
Defendants to Designate Site-Specific Experts	December 5, 2014
Close of Fact Discovery	January 5, 2015
Defendants to Serve Non-Site Specific Expert Reports	
Plaintiffs to Serve Non-Site-Specific Rebuttal Reports, if any	February 6, 2015
Plaintiffs to Serve Site-Specific Expert Reports	February 18, 2015

Deadline to Serve Requests for Admission	April 3, 2015
Defendants to Serve Site-Specific Expert Reports	
Plaintiffs to Serve Site-Specific Rebuttal Reports, if any.	May 15, 2015
Close of Expert Discovery	June 15, 2015

**SO ORDERED:**

Dated: New York, New York  
November \_\_, 2013

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Shira A. Scheindlin  
U.S.D.J.